

## EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION**

GEORGIA STATE CONFERENCE OF THE NAACP,  
as an organization; GEORGIA COALITION FOR THE  
PEOPLES' AGENDA, as an organization; SANQUAN  
THOMAS, MERRITT HUBERT, TAURUS HUBERT,  
JOHNNY THORNTON, MARTEE FLOURNOY and  
LARRY WEBB;

Plaintiffs,

v.

HANCOCK COUNTY BOARD OF ELECTIONS AND  
REGISTRATION; KATHY RANSOM, NANCY  
STEPHENS, LINDA CLAYTON, ROBERT INGRAM,  
and JIM YOUMANS, in their official capacities as  
members of the Hancock County Board of Elections and  
Registration; and TIFFANY MEDLOCK, in her official  
capacity as the Hancock County Elections Supervisor,

Defendant.

Civil Action  
Case No. 5:15-cv-414-CAR

**PLAINTIFFS' AMENDED 30(b)(6) DEPOSITION NOTICE FOR HANCOCK COUNTY  
BOARD OF ELECTIONS AND REGISTRATION**

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiffs Georgia State Conference of the NAACP, Georgia Coalition for the Peoples' Agenda, Sanquan Thomas, Merritt Hubert, Taurus Hubert, Johnny Thornton, Martee Flournoy, and Larry Webb will take the deposition of Hancock County Board of Elections and Registration on **Tuesday, June 28, 2016** beginning at **9:00 a.m.**, at the Hancock County Board of Elections and Registration offices, located at 10571 Hwy 15 N, Sparta, Georgia 31087. The deposition shall be recorded by a court reporter and videographer who is authorized to administer oaths in the state of Georgia. The deposition will continue from day to day until completed.

Pursuant to Rule 30(b)(6), Hancock County Board of Elections and Registration shall designate one or more officers, directors or managing agents, or other persons to testify on its behalf regarding each of the subjects described in Exhibit A to this Notice.

This 21st day of June, 2016.

/s/ William V. Custer

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*Counsel for Plaintiffs*

*Georgia State Conference of the NAACP*

*Georgia Coalition for the Peoples' Agenda*

*Sanquan Thomas*

*Merritt Hubert*

*Taurus Hubert*

*Johnny Thornton*

*Martee Flourney*

*Larry Webb*

**EXHIBIT A**

**DEPOSITION TOPICS**

- (1) Past practices by the BOER related to sending mail to voters and the use of forwardable versus nonforwardable mail since August 2014.
- (2) Past procedures employed by the BOER regarding voter list maintenance activities, particularly for voters who have moved and whether the county has regularly complied with NVRA requirements over the years since 2006.
- (3) Past instances of voter fraud in Hancock County since 1996, the nature of that fraud, and the identity of participants in the fraud.
- (4) Past attempts by BOER members to remove voters from the Hancock County registration list based on their residential status since 2010, as reflected in comments and proposals put forward by BOER members at public hearings held between July and November of 2011.
- (5) Past attempts by the Sparta City Administrator and other city officials to remove voters from the list of registered voters eligible to vote in the City of Sparta since 1980 including, but not limited to, attempts to do so in 1984 and 1986.
- (6) Changes to the City of Sparta's municipal boundaries since 1965.
- (7) The City of Sparta's attempt to use numbered posts for city council elections in 1991 and 1992.
- (8) The video documentary, created by the Thames Production Company, of the racial dynamics in Hancock County before and after the emergence of John McCown, and the facts presented in that video.
- (9) Past election contests made in state court in Hancock County since 1986.
- (10) Past attempts by BOER members or Hancock County employees to verify voters' residence through comparison with driver's license records since 2010.
- (11) Past practices of the BOER and Hancock County elections officials related to determining the eligibility of absentee ballots since 2006.
- (12) The racial demographics of voters who did not receive absentee ballots after submitting an application for one and voters whose absentee ballots were not counted as a vote in elections held since August 2014.
- (13) The claims, allegations, and defenses asserted in this action.

**CERTIFICATE OF SERVICE**

I hereby certify that on the 21st day of June, 2016 I sent via U.S. Mail postage prepaid, and e-mail, a copy of the foregoing to the following:

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